

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

HANNAH ULERY,

Plaintiff,

v.

UNITED STATES OF AMERICA, ex rel.
JASON R. RAFFERTY, MD; MICHELLE
FORCIER, MD; JESSICA FIDALGO
TOUCINHO; ANDREW SACKETT-
TAYLOR; and THUNDERMIST
HEALTH CENTER,

Defendant.

C.A. No. 1:24-CV-24-MSM-PAS

**ASSENTED-TO EXTENSION OF TIME TO RESPOND TO UNITED
STATES' MOTION TO DISMISS PLAINTIFF'S COMPLAINT AS TO THE
FEDERAL DEFENDANTS FOR FAILURE TO STATE A CLAIM**

On February 7, 2025, the United States of America, by and through its counsel, submitted a Motion to Dismiss pursuant to Federal Rule of Procedure 12(b)(6). Plaintiff's counsel and Defendants' counsel have conferred on multiple occasions to discuss the case, including this Motion. During the most recent conference, on January 31, 2025, Plaintiff's counsel disclosed that the lead attorney for Plaintiff, Mr. Miller, was recently diagnosed with multiple stage-4 cancerous brain tumors, which have forced him to take leave from work for an undetermined period of time, awaiting further prognosis as he undergoes extensive treatment. Mr. Miller intends to remain as lead counsel but is currently unable to meet clients' needs, including Plaintiff's. Upon learning this, counsel for Defendant has been exceptionally gracious and understanding and, subject to the Court's approval, has agreed to Plaintiff's request for an extension of time of up to six (6) months to respond to the Motion to Dismiss. Accordingly,

Defendant does not oppose the relief requested in this Motion. Accordingly, Plaintiff, by and through undersigned counsel, respectfully requests an extension of six (6) months, up to and including August 7, 2025, for Plaintiff to respond to the United States of America's Motion to Dismiss in the above-captioned matter.

Respectfully submitted,

PLAINTIFF, HANNAH ULERY
By her Attorneys,

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